



HON. MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MARTHA NIMMER
Special Assistant Corporation Counsel
Cell: (917) 499-8632

January 8, 2025

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

at page 2

Re: *T.R., et al. v. New York City Dep't. of Educ.*, 22-cv-6373 (ER)(GS)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Hon. Muriel Goode-Trufant, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative proceedings under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

Defendant writes to respectfully request that the initial phone conference, currently scheduled for January 10, 2025, be adjourned to February 10, 2025, or a date thereafter more convenient for the Court. Plaintiff consents to this request. This is the fourteenth request to adjourn the conference. The first request was made on June 1, 2023 and granted by Your Honor the following day. The second request was made on Aug. 1, 2023 and granted by Your Honor on August 3, 2023. The third request was made on Oct. 6, 2023 and granted by Your Honor that day. The fourth request was made on Nov. 28, 2023 and granted by Your Honor on Nov. 30, 2023. The fifth request was made on Feb. 9, 2024 and granted by Your Honor that day. The sixth request was made on March 11, 2024 and granted by Your Honor on March 13, 2024. The seventh request was made on May 28, 2024 and granted by Your Honor that same day. The eighth request was made on June 27, 2024 and granted by Your Honor the following day. The ninth request was made on July 31, 2024 and granted by Your Honor the following day. The tenth request was made on Sept. 4, 2024 and granted by Your Honor the following day. The eleventh request was made on September 30, 2024 and granted by Your Honor the following day. The twelfth request was made on October 28, 2024 and granted by Your Honor the following day. The last request was made on December 3, 2024 and granted by Your Honor that day. The extension is requested to permit the parties to continue settlement discussions. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Benjamin Kopp, Esq. (via ECF)

Defendant's request is granted. The telephonic initial Conference is adjourned to February 13, 2025, at 10:00 AM. The parties are directed to dial 855-244-8681 and enter 2301 087 7354# when prompted.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: January 9, 2025

New York, New York